

1 Laura Vartain Horn (SBN 258485)  
2 **KIRKLAND & ELLIS LLP**  
3 555 California Street, Suite 2700  
4 San Francisco, CA 94104  
5 Telephone: (415) 439-1625  
6 laura.vartain@kirkland.com

7 Allison M. Brown (Admitted *Pro Hac Vice*)  
8 **KIRKLAND & ELLIS LLP**  
9 2005 Market Street, Suite 1000  
10 Philadelphia, PA 19103  
11 Telephone: (215) 268-5000  
12 alli.brown@kirkland.com

13 Jessica Davidson (Admitted *Pro Hac Vice*)  
14 **KIRKLAND & ELLIS LLP**  
15 601 Lexington Avenue  
16 New York, NY 10022  
17 Telephone: (212) 446-4800  
18 jessica.davidson@kirkland.com

19 *Attorneys for Defendants*  
20 UBER TECHNOLOGIES, INC., RASIER, LLC,  
21 And RASIER-CA, LLC  
22 [Additional Counsel Listed on Signature Page]

23  
24  
25  
26  
27  
28  
**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

19 IN RE: UBER TECHNOLOGIES, INC.,  
20 PASSENGER SEXUAL ASSAULT  
21 LITIGATION

Case No. 3:23-md-03084-CRB

22 This Document Relates to:  
23 ALL ACTIONS

DEFENDANTS UBER TECHNOLOGIES,  
INC., RASIER, LLC, AND RASIER-CA,  
LLC'S STATEMENT IN SUPPORT OF  
BRET STANLEY'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL

1                   **TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

2                   Pursuant to Civil Local Rules 7-11(b) and 79-5(c) and the Protective Order entered in this case  
 3 dated December 28, 2023, ECF 176 (“Protective Order”), Defendants Uber Technologies, Inc., Rasier,  
 4 LLC, Rasier-CA, LLC (collectively “Defendants” or “Uber”), respectfully submit this statement in  
 5 support of Bret Stanley’s Administrative Motion to File Under Seal Portions of Supporting Materials  
 6 in Response to Motion for Sanctions, dated November 17, 2025, ECF 4420 (“Stanley Sealing Motion”)  
 7 related to Plaintiff Counsel Bret Stanley’s Response in Opposition to Defendants’ Motion for  
 8 Sanctions, dated November 17, 2025, ECF 4421 (“Stanley Sanctions Opposition”). Uber supports the  
 9 Stanley Sealing Motion because the Court has already found good cause to seal substantially similar  
 10 documents and information or because Defendants have already asked the Court to seal the same or  
 11 similar documents and information filed provisionally under seal.

12                  In the Stanley Sealing Motion, Mr. Stanley seeks to file certain portions of five documents  
 13 under seal: (1) the Stanley Sanctions Opposition (ECF 4420-3; redacted version filed at ECF 4421);  
 14 (2) Mr. Stanley’s Declaration in support of the Stanley Sanctions Opposition (ECF 4420-4; redacted  
 15 version filed at ECF 4421-1); (3) Exhibit A to Mr. Stanley’s Declaration (ECF 4420-5; redacted  
 16 version filed at ECF 4421-2 at 1-9); (4) Exhibit B to Mr. Stanley’s Declaration (ECF 4420-6; redacted  
 17 version filed at ECF 4421-2 at 10-18); and (5) Exhibit E to Mr. Stanley’s Declaration (ECF 4420-7;  
 18 redacted version filed at ECF 4421-2 at 25-33).

19                  **(1) Stanley Sanctions Opposition and (2) Stanley Declaration:** For the same reasons stated  
 20 in Defendants’ Administrative Motion to File Under Seal Portions of Motion for Sanctions (ECF  
 21 4232), Defendants support Mr. Stanley’s request to seal the portions of the Stanley Sanctions  
 22 Opposition and Mr. Stanley’s Declaration in support of the Stanley Sanctions Opposition that discuss  
 23 confidential, non-public information regarding fee arrangements between Defendants and their outside  
 24 counsel. Mr. Stanley’s motion to seal, with respect to these documents, should be granted in full.

25                  **(3) Exhibit A, (4) Exhibit B, and (5) Exhibit E to the Stanley Declaration:** Defendants  
 26 support Mr. Stanley’s request to seal certain portions of Exhibits A and B containing the names and  
 27 details about Uber’s Knowledge Base system and other policy-related resources, as well as non-public,  
 28 confidential information concerning Uber’s internal systems’ functionality and its informational

1 infrastructure.<sup>1</sup> The Court has previously found good cause to seal documents containing the same or  
 2 substantially similar information, *see* Aug. 18, 2025 Order, ECF 3709 (granting ECF 3511), and  
 3 Defendants support Mr. Stanley's request that the Court do the same here.

4 Defendants also support Mr. Stanley's request to seal a portion of Exhibit A containing URL  
 5 links to internal Uber sites and resources.<sup>2</sup> The Court has previously allowed the redaction of URLs  
 6 because of the potential cybersecurity risk of disclosing them on a public docket and the lack of any  
 7 public interest in the disclosure of URLs, especially when the links are potentially connected to  
 8 confidential, sensitive, or non-public information. *See, e.g.*, Mar. 18, 2025 Order, ECF 2545 at 7  
 9 (granting ECF 2476 at 5). Defendants likewise support Mr. Stanley's request for the Court to do so  
 10 again here.<sup>3</sup>

11  
 12 DATED: November 21, 2025

Respectfully submitted,

13 By: /s/ Daniel Cummings  
 14 DANIEL CUMMINGS

15 MICHAEL B. SHORTNACY (SBN: 277035)  
 mshortnacy@shb.com  
 16 **SHOOK, HARDY & BACON L.L.P.**  
 2121 Avenue of the Stars, Ste. 1400  
 Los Angeles, CA 90067  
 17 Telephone: (424) 285-8330  
 Facsimile: (424) 204-9093

18 PATRICK OOT (Admitted *Pro Hac Vice*)  
 19 oot@shb.com  
 20 **SHOOK, HARDY & BACON L.L.P.**  
 1800 K St. NW Ste. 1000  
 Washington, DC 20006  
 21 Telephone: (202) 783-8400  
 Facsimile: (202) 783-4211

22  
 23  
 24  
 25  
 26 <sup>1</sup> These redactions are located at ECF 4421-2 pages 3, 4, 12-15, and 17.  
 27 <sup>2</sup> These redactions are located at ECF 4421-2 at 4.  
 28 <sup>3</sup> As to Mr. Stanley's other proposed redactions of Exhibits A, B, and E, not identified herein,  
 Defendants take no position.

DANIEL CUMMINGS (Admitted *Pro Hac Vice*)  
decummings@shb.com  
**SHOOK, HARDY & BACON L.L.P.**  
2555 Grand Blvd.  
Kansas City, MO 64108  
Telephone: (816) 474-6550  
Facsimile: (816) 421-5547

*Attorney for Defendants*  
UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC